

Glenn R. Kantor – SBN 122643  
E-mail: [gkantor@kantorlaw.net](mailto:gkantor@kantorlaw.net)  
Corinne Chandler – SBN 111423  
E-mail: [cchandler@kantorlaw.net](mailto:cchandler@kantorlaw.net)  
Mitchell O. Hefter – SBN 291985  
E-mail: [mhefter@kantorlaw.net](mailto:mhefter@kantorlaw.net)  
KANTOR & KANTOR, LLP  
19839 Nordhoff Street  
Northridge, CA 91324  
Telephone: (818) 886-2525  
Facsimile: (818) 350-6272

Attorneys for Plaintiff,  
MARTA BONNIN

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

MARTA BONNIN,

Plaintiff,

vs.

UNUM LIFE INSURANCE  
COMPANY OF AMERICA;  
HINDERLITER, DELLAMAS &  
ASSOCIATES PLAN,

Defendants.

CASE NO: 2:17-cv-04513-JAK-JC

**APPLICATION FOR AN ORDER  
TO ALLOW CONFIDENTIAL  
RECORDS TO BE FILED UNDER  
SEAL; [PROPOSED] ORDER IN  
SUPPORT THEREOF**

Date: September 10, 2018  
Time: 11:00 a.m.  
Crtm: 10B

**APPLICATION**

PLEASE TAKE NOTICE that pursuant to Local Rule 79-5.1, plaintiff Marta Bonnin hereby applies to the Honorable John A. Kronstadt in Courtroom 10B of this Court, located at the First Street Courthouse, 350 W. First Street, Los Angeles, California, for an order that the following document be filed under seal:

- Plaintiff's Opening Trial Brief
- Defendant Unum Life Insurance Company of America's Supplemental Responses to Plaintiff's First Set of Interrogatories

**GOOD CAUSE**

Good cause exists for granting this Application because:

- (1) The Opening Brief and defendant's Supplemental Response to Interrogatories contain information which has been designated by Unum as "confidential" under the Protective Order entered in this case on June 11, 2018. Dkt. #36.
- (2) Plaintiff has complied with FRCP 5.2 and Local Rule 5.2-1 by redacting information which defendant has designated as confidential.
- (3) Plaintiff met and conferred with counsel for Unum regarding the public disclosure of the information/documents on June 27, 2018. Defendant maintains that said information/documents may not be filed in the public domain.

DATED: July 2, 2018

KANTOR & KANTOR, LLP

By: /s/ Mitchell O. Hefter

Mitchell O. Hefter  
Attorneys for Plaintiff  
MARTA BONNIN

KANTOR & KANTOR LLP  
19839 Nordhoff Street  
Northridge, California 91324  
(818) 886 2525

**PROOF OF SERVICE**

STATE OF CALIFORNIA        )  
COUNTY OF LOS ANGELES    ) ss.

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 19839 Nordhoff Street, Northridge, California 91324.

On July 2, 2018, I served the foregoing document described as  
**APPLICATION FOR AN ORDER TO ALLOW CONFIDENTIAL RECORDS  
TO BE FILED UNDER SEAL; [PROPOSED] ORDER IN SUPPORT  
THEREOF** in this action by serving a true copy thereof addressed as follows:

Linda M. Lawson, Esq.  
Kristin Kyle de Bautista, Esq.  
MESERVE, MUMPER & HUGHES LLP  
800 Wilshire Boulevard, Suite 500  
Los Angeles, CA 90017-2611

[X] (BY MAIL) I deposited such envelope in the mail at Northridge, California. The envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Northridge, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on July 2, 2018, Northridge, California.



Susan Peterson